IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

PRO-FOOTBALL, INC.,

Plaintiff,

Civil Action No.: 1:14-cv-1043-GBL-IDD

v.

AMANDA BLACKHORSE, MARCUS BRIGGS-CLOUD, PHILLIP GOVER, JILLIAN PAPPAN and COURTNEY TSOTIGH,

Defendants.

DEFENDANTS' RESPONSE TO MOTIONS TO SEAL

Defendants Amanda Blackhorse, Marcus Briggs-Cloud, Phillip Gover, Jillian Pappan, and Courtney Tsotigh, by and through counsel, do not oppose and hereby consent to the relief sought by Plaintiff Pro-Football, Inc.'s (1) Motion to Seal Exhibits 41-48 and File Redacted Brief [Dkt. 61] and (2) Motion to Seal Exhibit 132 and File Redacted Brief [Dkt. 102].

Dated: March 20, 2015 Respectfully submitted,

/s/ Jeffrey J. Lopez

Jesse A. Witten (*pro hac vice* pending) Jeffrey J. Lopez (Va. Bar No. 51058) Adam Scott Kunz (VA Bar No. 84073) Tore T. DeBella (VA Bar No. 82037) Jennifer T. Criss (VA Bar No. 86143) DRINKER BIDDLE & REATH LLP 1500 K Street, N.W., Suite 1100 Washington, D.C. 20005-1209

Telephone: (202) 842-8800 Facsimile: (202) 842-8465

Email: Jesse.Witten@dbr.com

Jeffrey.Lopez@dbr.com

Adam.Kunz@dbr.com Tore.DeBella@dbr.com Jennifer.Criss@dbr.com

Counsel for Defendants Amanda Blackhorse, Marcus Briggs-Cloud, Phillip Gover, Jillian Pappan and Courtney Tsotigh

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of March, 2015, the foregoing pleading or paper was filed and served electronically by the Court's CM/ECF system upon all registered users in this action:

/s/ Jeffrey J. Lopez

Jeffrey J. Lopez
DRINKER BIDDLE & REATH LLP
1500 K Street, N.W., Suite 1100
Washington, D.C. 20005-1209
Telephone: (202) 842-8800

Facsimile: (202) 842-8465

Email: Jeffrey.Lopez@dbr.com

Counsel for Defendants Amanda Blackhorse, Marcus Briggs-Cloud, Phillip Gover, Jillian Pappan and Courtney Tsotigh